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Diane Fischer,
 of counsel

January 22, 2024

*Application
DENIED without
prejudice,*

Honorable P. Kevin Castel
 United States District Judge
 United State District Court
 50 Pearl Street
 New York, New York

Re: United States v. Omar Lopez Castro, 19-536

Dear Judge P. Kevin Castel:

Andrew Frisch and I are recently retained new counsel for Omar Lopez Castro. We have filed notices of appearance, ordered and received the trial transcripts and we have just begun to review them. Apparently, trial counsel did not make any motions, at the close of the government's case or post-trial, pursuant Rules 29 and 33. We are writing to request that the Court extend Mr. Castro's time to file those motions once we have had an opportunity to evaluate the trial testimony, evidence, relevant proceedings, meet with our client, and investigate any reasons why the motions were not previously made.

Mr. Castro's presentence interview is scheduled for January 29, 2024. The sentencing date, currently February 20, 2024, is likely to be adjourned on motion of the probation department in order to issue the report at least 35 days before sentencing.

We ask that the court either extend the time to file any post-trial motions for 60 days or hold this letter motion in abeyance until the court has an opportunity to review any motions we may make.

Respectfully submitted,
 /s/

Susan Wolfe

*Please submit case
law support for the Court's authority
to extend the time limit
in Rule 29(c)(1) and Rule
33(b)(2) after
the expiration of the
time limit.
SO ORDERED
P. Castel
WSDD
1-23-24*